

FRP FIELD DEFICIENCY REPORT

- ☐ FRP not prepared and submitted as required by 40 CFR Part 112.20
- ☐ Amendment not submitted as required by 40 CFR Part 112.20
- ☐ The facility owner/operator did not maintain the substantial harm certification as required by 40 CFR Part 112.20 (e)
- ☐ FRP not consistent with NCP/ACP as required by 40 CFR Part 112.20 (g). NCP/ACP require coordination, mitigation, communication, containment, and removal constituents.
- ☐ Contents of FRP are not consistent with model plan as required by 40 CFR Part 112.20 (h) See Attachment A: FRP Checklist. All items must be addressed or stated as non-applicable.
- ☐ Incomplete facility information as required by 40 CFR Part 112.20 (h)(2). See section 1.2 of the FRP checklist.
- ☐ Inadequate emergency response information as required by 40 CFR Part 112.20 (h)(3). Incomplete emergency notification phone list, see section 1.3.1 of the FRP checklist. Incomplete response equipment list. See section 1.3.2 of the FRP checklist. Incomplete response equipment testing and/or drill logs, see section 1.3.3 of the FRP checklist. Incomplete response personnel information, see section 1.3.4 of the FRP checklist. Incomplete evacuation plans, see section 1.3.5 of the FRP checklist. Incomplete description of qualified individuals duties, see section 1.3.6 of the FRP checklist.
- ☐ Insufficient information regarding hazard evaluation as required by 40 CFR Part 112.20 (h)(4). Incomplete hazard identification information, see section 1.4.1 of the FRP checklist. Incomplete analysis of oil spill effects on vulnerable areas. See section 1.4.2 of the FRP checklist. Incomplete analysis of potential for an oil spill, see section 1.4.3 of the FRP checklist. Inadequate discussion of oil spill history, see section 1.4.4 of the FRP checklist.
- ☐ Inadequate discussion of response planning levels as required by 40 CFR Part 112.20 (h)(5). Incomplete or no description of small and/or medium discharge scenarios, see section 1.5.1 of the FRP checklist. Incomplete or no description of worst case scenario, see section 1.5.2 of the FRP checklist..
- ☐ Inadequate discussion of discharge detection as required by 40 CFR Part 112.20 (h)(6). Incomplete description of discharge detection systems, see section 1.6 of the FRP checklist.

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- Inadequate discussion of plan implementation as required by 40 CFR Part 112.20 (h)(7). Incomplete identification and/or description of response resources, see section 1.7.1 of the FRP checklist. Disposal plans incomplete, see section 1.7.2 of the FRP checklist. Incomplete or no description of containment and/or drainage plan. See section 1.7.3 of the FRP checklist.
- Inadequate self inspection, drills/exercises, or response training as required by 40 CFR Part 112.20 (h)(8). Incomplete self-inspection, see section 1.8.1 of the FRP checklist. Incomplete description of facility drills, exercises and/or logs, see section 1.8.2 of the FRP checklist. Incomplete description of response training and/or logs, see section 1.8.3 of the FRP checklist.
- Inadequate site plan or drainage plan diagrams as required by 40 CFR Part 112.20 (h)(9). Incomplete information of Site Plan, Drainage Plan, and/or Evacuation Plan diagrams, see section 1.9 of the FRP checklist.
- Inadequate description of facility security systems as required by 40 CFR Part 112.20 (h)(10). Incomplete description of security systems, see section 1.10 of the FRP checklist.

### SPCC FIELD DEFICIENCY REPORT

- ☐ SPCC plan not prepared, certified by a P.E., and/or not available as required by 40 CFR 112.3.
- ☐ No evidence of management approval of SPCC plan as required by 40 CFR Part 112.7.
- ☐ No evidence of three year review and/or certified amendments as required by 40 CFR Part 112.5.
- ☐ Insufficient prediction of equipment failure and resulting discharge as required by 40 CFR Part 112.7(b).
- ☐ Insufficient discussion of appropriate containment and/or diversionary structures or equipment in plan as required by 40 CFR Part 112.7(c).
- ☐ Insufficient demonstration of impracticality of secondary containment and/or no strong contingency plan (40 CFR Part 109) as required by 40 CFR Part 112.7(d).
- ☐ Incomplete written procedures and/or inspection records as required by 40 CFR Part 112.7(e)(8).
- ☐ Incomplete personnel training and spill prevention procedures as required by 40 CFR Part 112.7(e)(10).

### OFFSHORE PRODUCTION

- ☐ Inadequate oil drainage collection equipment/system. (such as: curbing, drip pans, and sump system) [40 CFR Part 112.7 (e)(7)(ii)]
- ☐ Inadequate maintenance/inspection of sump system. [40 CFR Part 112.7 (e)(7)(iii)]
- ☐ Separators/treaters not engineered to prevent oil discharges and/or inadequate spill prevention system. [40 CFR Part 112.7 (e)(7)(iv)]
- ☐ Tanks not engineered to prevent oil discharges and/or inadequate system. [40 CFR Part 112.7 (e)(7)(v) or (vi)]
- ☐ Tanks not suitably corrosion protected and/or advanced corrosion evident. [40 CFR Part 112.7 (e)(7)(vii)]
- ☐ Inadequate maintenance, inspection and testing of pollution prevention equipment and systems and/or written procedures maintained at facility and plan as required by 40 CFR Part 112.7 (e)(7)(viii) and (ix).

- ☐ Manifold not equipped with check-valves for all flowlines. [40 CFR Part 112.7 (e)(7)(xiv)]
- ☐ No high-pressure sensing devices/wellhead shut-in valves/alternate pressure relief system. [40 CFR Part 112.7 (e)(7)(xv)]
- ☐ Inadequate corrosion protection and/or maintenance/inspection of facility pipelines. [40 CFR Part 112.7 (e)(7)(xvi),(xvii) and (xviii)]

### ADDITIONAL COMMENTS AND RECOMMENDATIONS

Based on the operational interviews and field inspection, the following are recommendations which may improve or enhance the response capability for this facility:

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